

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, SOUTHWEST VOTER
REGISTRATION EDUCATION PROJECT,
MI FAMILIA VOTA, AMERICAN GI
FORUM, LA UNION DEL PUEBLO
ENTERO, MEXICAN AMERICAN BAR
ASSOCIATION OF TEXAS, TEXAS
HISPANICS ORGANIZED FOR
POLITICAL EDUCATION, WILLIAM C.
VELASQUEZ INSTITUTE, FIEL
HOUSTON INC., TEXAS ASSOCIATION
OF LATINO ADMINISTRATORS AND
SUPERINTENDENTS, PROYECTO
AZTECA, REFORM IMMIGRATION FOR
TEXAS ALLIANCE, WORKERS
DEFENSE PROJECT, JOSE OLIVARES,
PAULITA SANCHEZ, JO ANN
ACEVEDO, DAVID LOPEZ, and DIANA
MARTINEZ ALEXANDER

Plaintiffs

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas; JANE
NELSON, in her official capacity as Texas
Secretary of State; and the STATE OF TEXAS

Defendants.

Case No. 3:21-cv-00259-DCG-
JES-JVB

LULAC PLAINTIFFS' AMENDED DESIGNATION OF EXPERTS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(2)(A)

Pursuant to the Scheduling Order, LULAC Plaintiffs designate the following expert
witnesses for the trial or any other evidentiary proceeding in this matter.

I.
Retained Expert Witnesses

1. Jacob M. Grumbach, Ph.D.

The Goldman School of Public Policy
UC Berkeley
2607 Hearst, Room 208
Berkeley, CA 94720-7320
(O): (510) 642-4670
jakegrumbach@gmail.com

Dr. Grumbach will testify regarding his reports and previously-disclosed file materials and prior testimony. He will also testify regarding the report and file materials served on this date.

2. Bernard Fraga, Ph.D.

Emory University
327 Tarbuton Hall
1555 Dickey Drive
Atlanta, Georgia 30322
404-727-2442
blfraga@icloud.com

Dr. Fraga will testify regarding the report and file materials served on this date.

3. Maria Cristina Morales, Ph.D.

University of Texas at El Paso
Department of Sociology & Anthropology
El Paso, Texas 79968-8900
(O): (915) 747-6838
mcmorales2016@gmail.com

Dr. Morales will testify regarding her reports and previously-disclosed file materials and prior testimony. She will also testify regarding the report and file materials served on this date.

4. Rogelio Sáenz, Ph.D.

University of Texas at San Antonio
Department of Demography
MS Building 4.01.50
One UTSA Circle
San Antonio, TX 78249
T: (210) 458-3163
rogelio.saenz@utsa.edu

Dr. Saenz will testify regarding his reports and previously-disclosed file materials and prior testimony. He will also testify regarding the report and file materials served on this date.

5. Andrés Tijerina, Ph.D.

2716 Tether Trail
Austin, TX 78704
C: (512) 619-3280
andrest@austincc.edu

Dr. Tijerina will testify regarding his reports and previously-disclosed file materials and prior testimony.

II.
Non-Retained Expert Witnesses

LULAC Plaintiffs hereby designate and state that they intend to call for the purpose of fact and/or opinion testimony those persons listed in the witness disclosures of each party, as appropriate. LULAC Plaintiffs specifically give notice that they intend to rely on the expert testimony of other Plaintiffs groups and may independently call the experts designated by the other Plaintiffs in the event they do not do so or only call for a limited purpose. In order to streamline trial presentation and not present overly duplicative testimony, LULAC Plaintiffs will rely on expert opinions given by other experts called by other Plaintiffs and their counsel. The designation of experts, reports and expert disclosures served by other Plaintiffs are incorporated herein for all purposes. Plaintiffs make this designation without conceding the qualifications, relevancy, reliability or admissibility of such witness' opinions.

III.
Additional Designation

Plaintiffs hereby cross designate and state that Plaintiffs may call any expert witness identified or designated by any party or any employee or representative of any party, subject to any objections that Plaintiffs may make concerning the designation or qualifications of those witnesses.

Plaintiffs reserve the right to elicit by way of cross examination, opinion testimony from experts or representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit.

Plaintiffs reserve the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render testimony, but are not retained or designated experts at this time and who have expertise in certain areas regarding the facts of this case. Such non-retained expert witnesses may be employees of the State of Texas but they have not been employed for the purpose of providing expert testimony.

Plaintiffs reserve the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit.

Plaintiffs reserve the right to supplement this designation as necessary and to solicit opinion testimony from such persons as appropriate during both discovery and trial.

Plaintiff designates and reserves the right to call any expert designated by Defendants or called by Defendants at hearing or trial.

IV.
Supplementation and Amendment Disclaimer

LULAC Plaintiffs specifically reserve the right to supplement and/or amend these designations, including the expert reports provided with these designations to review, assess, and incorporate as necessary any discovery that becomes available after this designation. In light of the recent release of 2024 election data by the Texas Legislative Council, and the assertion of legislative privilege over testimony and thousands of documents related to the 2021 redistricting process, all of the experts in this case for all of the Plaintiffs in this redistricting litigation would benefit from additional discovery, particularly deposition discovery and fulsome document production discovery.

Dated March 31, 2025

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND

/s/ Nina Perales

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*Counsel for Plaintiffs League of United Latin American
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing and all attachments were served on counsel of record via email on March 31, 2025.

/s/ Nina Perales

Nina Perales

*Counsel for Plaintiffs League of United Latin
American Citizens, et al.*